

MATTHEW J. KLUGER  
ATTORNEY AT LAW

888 GRAND CONCOURSE, SUITE 1H  
BRONX, NEW YORK 10451  
(718) 293-4900 • FAX (718) 618-0140  
[www.klugerlawfirm.com](http://www.klugerlawfirm.com)

August 8, 2021

By Email & ECF

The Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The request to modify the conditions of pretrial release to permit the travel referenced below is GRANTED.

**SO ORDERED.**

Dated: August 9, 2021  
New York, New York

**Re: United States v. Temitope Omotayo**  
**19 Cr. 291 (LAP)**

  
LORETTA A. PRESKA, U.S.D.J.

Dear Judge Preska,

Bail in this matter was set on April 25, 2019 (Pitman, MJ). As a condition of his bail, Mr. Omotayo's travel was restricted to the Southern, Eastern, and Northern Districts of New York. The defense writes now seeking an emergency modification of the travel conditions.

Unfortunately, a close relative of Mr. Omotayo's has passed away. The funeral is this coming Tuesday. Accordingly, Mr. Omotayo respectfully seeks permission to travel to Indiana forthwith and return on Thursday, August 12, 2021. He will be staying at his cousin's home located at 9049 Cardinal Flower Court, Indianapolis, Indiana.<sup>1</sup>

AUSA Daniel Wolf and Pretrial Services Officer Courtney DeFeo consent to this request.

Thank you for the Court's consideration.

Respectfully Submitted,

/s/ Matthew J. Kluger  
Matthew J. Kluger, Esq.

cc: AUSA Daniel Wolf  
Pretrial Services Officer Courtney DeFeo

<sup>1</sup> The defense notes that the Court has permitted Mr. Omotayo to stay at this address before without incident.